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15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
LETTER BRIEF TO COMPEL
STROZ-RELATED DISCOVERY
(DKT. 1994)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Letter Brief to
6 Compel Stroz-Related Discovery (Dkt. 1994).

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Exhibit 2	Red Boxes
Exhibit 10	Red Boxes

13 3. The red boxes in Exhibit 2 contain highly confidential information relating to a
14 business agreement, including specific obligations and financial terms. This information is
15 maintained as confidential. Public disclosure of this information would allow Uber's competitors
16 and counterparties to obtain an advantage by gaining insight to the terms offered by Uber, such
17 that they can tailor their own negotiation strategy, to the detriment of Uber's competitive
18 standing.

19 4. The red boxes in Exhibit 10 contain the email addresses, including personal email
20 addresses, of company executives and employees whose contact information may become
21 compromised if disclosed to the public. Defendants seek to seal this information in order to
22 protect the privacy of these individuals because this lawsuit is currently the subject of extensive
23 media coverage. Disclosure of this information could expose these individuals to harm or
24 harassment.

25 5. Defendants' request to seal is narrowly tailored to the portions of Waymo's
26 Motion and its supporting papers that merit sealing.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this
2 17th day of October, 2017 in Washington, District of Columbia.

3
4 /s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 17, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ